

EXHIBIT 19

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CYCLE-CRAFT CO., INC. d/b/a
BOSTON HARLEY-DAVIDSON/BUELL,

Plaintiff,

vs.

Civil Action
No. 04 11402

HARLEY-DAVIDSON MOTOR COMPANY,
INC., and BUELL DISTRIBUTION
COMPANY, LLC,

Defendants.

300 SE 2nd Street
Fort Lauderdale, Florida
February 2, 2005
1:00 p.m.

THE VIDEOTAPED DEPOSITION OF

DEBRA LUNSFORD

Taken on Behalf of the Defendants
Pursuant to Notice of Taking Deposition
Commencing at 1:12 p.m.

FLORIDA REALTIME REPORTING - 954.767.0450

Lunsford, Debra 24688sm

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1 MR. BERKOWITZ: Yeah, this is -- we're on
2 No. 3.

3 BY MR. BERKOWITZ

4 Q. And this is another set of the bills of
5 sale prepared by Boston Harley-Davidson, but now
6 we've got a price listed, is that correct?

7 A. Yes.

8 MR. REHNQUIST: I'm going to object to the
9 foundation. I don't think the witness has any
10 basis for knowing that, and she hasn't reviewed
11 the document to see what they are.

12 A. I --

13 MR. CONTINI: Just wait for a specific
14 question.

15 THE WITNESS: Okay.

16 MR. CONTINI: And don't speculate, Debbie.
17 Only if you have personal knowledge of
18 something.

19 THE WITNESS: Okay.

20 BY MR. BERKOWITZ

21 Q. Did you cause 19 separate cashier's checks
22 to be issued for these motorcycles, payable to
23 Boston Harley-Davidson?

24 A. Yes.

25 Q. All right. Can you identify what we've

1 THE WITNESS: I'm sorry. I'm not
2 accustomed to this, okay.

3 MR. REHNQUIST: No one should be.

4 THE WITNESS: Okay.

5 MR. CONTINI: Bill, it may make it faster
6 for everybody -- the only reason why there's an
7 interruption on the invocation of her Fifth is
8 because of the concerns for Federal money
9 laundering statutes.

10 MR. BERKOWITZ: All right. Well, that's
11 fine.

12 MR. CONTINI: And that's -- she's going to
13 answer everything she can.

14 MR. BERKOWITZ: I appreciate that.

15 MR. CONTINI: 95 percent of the questions
16 today.

17 BY MR. BERKOWITZ

18 Q. On these checks in Exhibit 4, there's --
19 there are names for these 19 people that are in the
20 remitter line; do you see that? I'm not asking who
21 put the names in. I just want to see if you can
22 identify --

23 A. Yes.

24 Q. -- yes, there are names.

25 A. Yes.

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1 Q. And to your knowledge did any of those
2 people provide any funds for the purchase of any of
3 these motorcycles to DCI?

4 A. Yes.

5 Q. Yes, they did?

6 A. No, I'm sorry. Say that again.

7 Q. Did any of the 19 people that are
8 identified as these fictitious customers, did they
9 provide any money to DCI for any of these bikes?

10 A. No, they did not. This was all DC
11 International's money.

12 Q. Okay. And this was -- these funds were
13 coming out of DC International's bank account at
14 Northern Trust Bank of Florida, is that correct?

15 A. That's correct.

16 MR. REHNQUIST: Objection. Leading.

17 (Conferring with counsel.)

18 MR. CONTINI: I apologize, gentlemen, for
19 the interruptions on my behalf before.

20 BY MR. BERKOWITZ

21 Q. The -- the date of the checks, of all of
22 the checks, is July 28, 2003; do you see that?

23 A. Yes.

24 Q. That's on Exhibit 4, correct?

25 A. Yes.

1 purchaser took title to his or her motorcycle in his
2 or her own name, as reflected on the certificates of
3 origin in each deal jacket." Do you see that
4 sentence?

5 A. Yes, I do.

6 Q. Is that sentence true?

7 A. No.

8 Q. In fact, DCI purchased all of the 19
9 motorcycles, is that correct?

10 A. Yes, we did.

11 MR. REHNQUIST: Objection.

12 BY MR. BERKOWITZ

13 Q. And Boston Harley-Davidson was aware of
14 that, is that correct?

15 MR. REHNQUIST: Objection, leading.

16 A. Boston Harley-Davidson instructed us to do
17 it that way.

18 BY MR. BERKOWITZ

19 Q. The last sentence of Paragraph 6 states,
20 quote, on paper and as far as anyone at Cycle-Craft
21 knew or could have known, these were sales to
22 individual purchasers in compliance with all
23 Harley-Davidson policies, end quote. Do you see
24 that statement?

25 A. Yes, I do.

1 the plea agreement with the State Attorney's
2 Office out of Palm Beach, the charge would then
3 be dismissed. So she was never convicted.
4 Jeopardy did attach and that's why she's
5 answering your questions today, trying to be as
6 cooperative and helpful as possible, as opposed
7 to sitting here, invoking her Fifth Amendment
8 privilege, which she otherwise could do
9 arguably. I just wanted you to know it wasn't
10 just the title fraud. I forget which felony
11 you mentioned just now, you mentioned a
12 particular felony, but it would speak to many
13 other arguable felonies, for instance, title
14 fraud, sales tax fraud, wire fraud, bank fraud,
15 money laundering.

16 BY MR. REHNQUIST

17 Q. I'm not -- I don't mean to quibble about
18 the scope of the -- of the charges, but what I do
19 want to understand is that you did enter into a plea
20 agreement, is that correct?

21 A. Yes.

22 Q. And you did plead guilty to a charge,
23 correct?

24 A. Yes. One charge of title fraud.

25 Q. Right. And that -- and that's a felony in

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1 the State of Florida?

2 A. Yes.

3 Q. And you received a sentence of one year
4 probation, is that my understanding?

5 A. Pretrial intervention.

6 MR. CONTINI: Yeah, and I again might be
7 at fault here. I don't know that she pled
8 guilty. She may have pled no contest. I'm not
9 entirely sure. Now, in retrospect, I believe
10 it may have been a guilty plea in order to get
11 into PTI, but it's separate and distinct from
12 probation. Had she gone into -- had she been
13 sentenced to probation, adjudication might be
14 withheld. In Massachusetts I believe they call
15 it a continuance without a finding. Here they
16 call it adjudication withheld. She didn't have
17 that kind of sentence. She was never sentenced
18 to probation.

19 It's somewhat confusing because the
20 probation department happens to monitor those
21 people who get into the PTI program. She was
22 accepted into the PTI program which results in
23 a dismissal of the underlying charge. And I
24 know that -- that may be too much information,
25 but she was not sentenced to probation. But I

1 believe you may be correct, Mr. Rehnquist; she
2 may have had to enter a guilty plea in order to
3 be accepted into PTI.

4 BY MR. REHNQUIST

5 Q. Well, Ms. Lunsford, your understanding,
6 and let me just ask you what your understanding is,
7 and the actual legal significance of it, your
8 attorney and I can sort out later. But your
9 understanding is that you did plead guilty to a
10 charge of title fraud?

11 A. Yes.

12 Q. And you pled guilty because you had
13 committed that crime, is that correct?

14 A. Yes.

15 Q. And you understood when you pleaded guilty
16 that you could have gone to trial and tried to
17 defend against that charge?

18 A. Yes.

19 Q. And you understood and I imagine you were
20 in front of a judge who told you if you went to
21 trial, you had all kind of defenses, you could
22 cross-examine witnesses, the government would have
23 to prove its case beyond a reasonable doubt and
24 other things like that; you understood all that,
25 correct?

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1 A. Yes.

2 Q. And instead, you pleaded guilty because
3 you were guilty?

4 A. Yes.

5 Q. Ms. Lunsford, when did you make the
6 decision that you would submit altered bills of sale
7 to the Department of Motor Vehicles? I mean, if we
8 can -- if we can just place it in context, July 30
9 was when you sent this fax to Libby. The
10 applications themselves are dated July 23rd, so that
11 may not be terribly helpful. But if you can place
12 it in terms of what we've been talking about today,
13 I'd just like to know when it was that you made the
14 decision to -- to alter the bills of sale.

15 A. When I didn't have the figures. When I
16 didn't have the correct amount of what the deal was
17 and I didn't know what each bike was. I didn't know
18 what to take out and what was taxable and wasn't --
19 and what wasn't taxable. That's when I just did the
20 best I could. I've never done -- I had never done
21 this before so I didn't know how it worked. So I
22 just did the best I could.

23 Q. Did you -- did you alter the bills of sale
24 before you knew how much the figures on the
25 cashier's check were?

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1 MR. REHNQUIST: Sorry.

2 MR. BERKOWITZ: Did you finish your
3 answer?

4 A. Excuse me?

5 MR. REHNQUIST: Yeah.

6 BY MR. REHNQUIST

7 Q. So you're testifying now about other
8 things you remember Ron saying in this first
9 conversation?

10 A. It could have been in any of those
11 conversations.

12 Q. Okay.

13 A. Okay. I don't know exactly which one it
14 was or when it was, but I just remember, you
15 know ...

16 Q. Did he tell you that these motorcycles had
17 to be sold to individuals?

18 A. Yes.

19 Q. And did he tell you that -- did he give
20 you any reason as to why the motorcycles had to be
21 sold to individuals?

22 A. Because he couldn't do a dealer-to-dealer
23 transaction because he had to do it in individual
24 names for his allocation. He had to -- it had to be
25 like a retail deal. That's the only way he could

1 let 19 motorcycles go.

2 Q. Again, but did he tell you that the sales
3 had to be made to individuals?

4 A. Yes.

5 Q. Do you remember anything else that -- that
6 Ron Buchbaum said in either this first conversation
7 or any conversation?

8 A. No. That's --

9 Q. That's the substance of it?

10 A. Pretty much, yeah.

11 Q. And again, you don't recall the -- the
12 number -- the exact number of the conversations or
13 the exact length of the conversations, but your best
14 memory is that there was two to three conversations
15 and they were no longer than five minutes, is that
16 correct?

17 A. I don't really remember, but yes, I guess
18 that's -- that's about it.

19 Q. And again, your best memory is that your
20 telephone conversations with Ron Buchbaum were when
21 you were in the DC Imports office?

22 A. Yes.

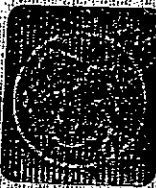
23 Q. And just to follow up, do you recall, when
24 you talked to either Ron Buchbaum or Sean Walsh,
25 where they were? In other words, do you know if you

EXHIBIT 20

Pay to the order of ***BOSTON UNITED SAVINGS***
ONE ROSA RAYON FCU
Northern Trust Bank of Florida N.A.
301036
Date 02-28-2003 33981660
THE SUM OF 19,576,500 DOLLARS
VOID OVER 15,965.00
\$**5,965.00**
Two signatures required for deposit over \$10,000.00
DOLLARS
Cashier's Check
Remitted
Kevin Greedy
Authorized Signature

C-C 00822
CONFIDENTIAL

$\Delta \pi$ EXHIBIT 4
Deponent Lunsford
Date 2/2/05 Rptr. TJ
WWW.DEPOBOOK.COM

	
Northern Trust Bank of Florida N.A.	
CHQ	BOOK/DATE/PCY
Pay to the order of ***BOSTON TRUST-DIRECTOR***	
THE SUM OF \$6,415.00 & 00/100	
VOID OVER \$6,415.00	
Remitter: <u>Edward Stevens</u>	
Cashier's Check	
Two signatures required for amount over \$50,000.00	
Date: <u>07-28-2005</u>	
804036	
6,415.00	
D.O.L.A.B.S	
Authorized Signature	
Authorized Signature	



C-C 00679
CONFIDENTIAL

05/14/2004 05:28 6173892675


PAGE 04

[illegible]

C-C 00902
CONFIDENTIAL

	Northern Trust Bank of Florida N.A.		301038
	Office	BOCA RATON ECV	63-965660
		Date	07-28-2003
Pay to the order of ***BOSTON HARLEY DAVIDSON***		\$	***9,095.00***
THE SUM OF \$9,095.00 DOLLARS			
VOID OVER \$9,095.00		Two signatures required for amount over \$50,000.00	
Remitter	Craig Kavilla	Authorized Signature	
Cashier's Check		Authorized Signature	
301038 60110076501 1010000101			

C-C 00861
CONFIDENTIAL

 Northern Trust Bank of Florida N.A.
Office BOCA RATON ECV 301039



Pay to the order of ***BOSTON HARLEY-DAVIDSON***
THE SUM OF \$5,965.00 Dols 00cts
VOID OVER \$5,965.00

JASON GOTTAM
Cashier's Check



\$5,965.00 DOLLARS
Two signatures required for amount over \$50,000.00

[Signature] Authorized Signature
[Signature] Authorized Signature

C-C 00666
CONFIDENTIAL


	Northern Trust Bank of Florida N.A.		301040
	Office BOCA RATON FL		63-965660
		Date 07-28-2003	
Pay to the order of ***BOSTON HARLEY-DAVIDSON***		\$	***15,639.00***
THE SUM OF \$15,639.00 DOLLARS			
VOID OVER \$15,639.00		Two signatures required for amount over \$50,000.00	
Remitter	Louis Gusoff		Authorized Signature
Cashier's Check			Authorized Signature
MICROFILM RECORD OF 10,000,000			

C-C 00838
CONFIDENTIAL

	Northern Trust Bank of Florida N.A.		301041
	BOCA RATON	REV	63-9652660
Date		07-28-2003	
Pay to the order of ***BOSTON HARLEY-DAVIDSON***		\$ ***7,855.00***	
THE SUM OF \$7,855.00 & 00/100ths		DOLLARS	
VOID OVER \$7,855.00		Two signatures required for amount over \$50,000.00	
Remitter: JASON LOZAN		Authorized Signature: 	
Cashier's Check		Authorized Signature: _____	


Amount in words: SEVEN THOUSAND EIGHT HUNDRED FIFTY FIVE AND 00/100 DOLLARS

C-C 00890
CONFIDENTIAL

 Northern Trust Bank of Florida N.A.
Office Boca Raton ECU 301042
Date 07-28-2003 63-955860

Pay to the order of ***BOSTON HARLEY-DAVIDSON*** \$ ***8,242.00***
THE SUM OF \$8,242.00 Dols 00 Cts
0-0111111


VOID OVER \$8,242.00 Two signatures required for amount over \$50,000.00

Rose Myuymaki
Remitter  Authorized Signature

Cashier's Check Authorized Signature

⑆01012⑆⑆00000150⑆010000104⑆

C-C 00716
CONFIDENTIAL

 Northern Trust Bank of Florida N.A.
Office BOCA RATON ECV 301043
Date 07-28-2003 63-985660

Pay to the order of ***BOSTON HARLEY-DAVIDSON***
THE SUM OF \$8,170.00 Eight Thousand One Hundred and Seventy Dollars \$ ***8,170.00***

VOID OVER \$8,170.00 DOLLARS

Remitter JAMES GUSOFF Two signatures required for amount over \$50,000.00


Cashier's Check Authorized Signature [Signature]

301043 0056009850110100001011 Authorized Signature

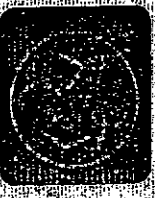
C-C 00593
CONFIDENTIAL

301044
Northern Trust Bank of Florida N.A.
Office: BOCA RATON FLV
Date: 07-28-2003
69495/660
8,925.00
Pay to the order of: ***BOSTON HARVEY-DAVIDSON***
THE SUM OF \$8,925.00 DOLLARS
VOID OVER \$8,925.00
Remitter: Thomas Sampson
Cashier's Check
Authorized Signature: [Signature]
Authorized Signature: [Signature]

C-C 00871
CONFIDENTIAL

	Northern Trust Bank of Florida N.A.		301046
	Office	BOCA RATON EGY	63-965650
		Date	07-28-2003
Pay to the order of ***BOSTON HARLEY-DAVIDSON***		\$	***8,170.00***
THE SUM OF \$8,170.00 Dols 00cts		DOLLARS	
VOID OVER \$8,170.00		Two signatures required for amount over \$50,000.00	
Remitter: Daniel Gusoff		Authorized Signature	
Cashier's Check		Authorized Signature	
CAUTION: MICR LINE SHOULD BE 10000101			

C-C 00607
CONFIDENTIAL




Northern Trust Bank of Florida N.A.
301047
07-26-2003
10301400

Pay to the order of WILSON, HARRIS, DAVISON, INC.
Date 07-26-2003


THE SUM OF 19,635.00 DOLLARS
\$ 19,635.00***

VOID OVER 16,350.00
Two signatures required for amounts over \$50,000.00.


Remitter: Blankford Loosheed
Cashier's Check


Authorized Signature

C-C 00733
CONFIDENTIAL

	
Northern Trust Bank of Florida N.A.	
Office: BOCA RATON FL	301048
Account Number: 1111111111111111	07-23-2003
Date: 07-23-2003	00000000
Pay to the order of: ***BOSTON HARBOR-DAVIDSON***	
THE SUM OF \$6,350.00 DOLLARS	
VOID OVER \$6,350.00	Two signature required for amount greater than \$50,000.00
Remitter: Michael Stebens	Authorized Signature: [Signature]
Cashier's Check	Authorized Signature: [Signature]

C-C 00748
CONFIDENTIAL




Northern Trust Bank of Florida N.A.
LOCAL NOCA RATION ECU


901049
07-22-2003
03409900

Pay to the order of AMAROSTON HEALTH SERVICES
THE SUM OF SEVENTY TWO THOUSAND DOLLARS
VOID OVER \$7,925.00

Two signatures required for amount over \$10,000.00
DOLLARS

Remitter HEATHER DELGADO
Cashier's Check



Authorized Signature


Authorized Signature

C-C 00785
CONFIDENTIAL

Northern Trust Bank of Florida N.A.		301050
Office	BOCA RATON EGV	83-965560
Date	07-28-2003	
Pay to the order of KARLSTON HANLEY-BANDERSON**		\$ 16,469.00**
THE SUM OF \$16,469.00 DOLLARS		
VOID OVER \$16,469.00		
KAREN CHRISTENSEN		
Remitter		
Cashier's Check		
Authorized Signature		
Authorized Signature		

C-C 00772
CONFIDENTIAL






Northern Trust Bank of Florida N.A.
Office BOCA RATON FL 301051
Date 07-28-2003 4998960

Pay to the order of THE SUMMIT DIALYSIS UNIT \$ ***16,484.00**
VOID OVER \$16,484.00


Harold Christensen
Remitter: Harold Christensen
Cashier's Check

Harold Christensen
Authorized Signature

C-C 00647
CONFIDENTIAL

	Northern Trust Bank of Florida N.A.		301052
	Office: BOCA RATON EGV		63/965/660
		Date: 07-28-2003	
Pay to the order of: ***BOSTON HARLEY-DAVIDSON***		\$ ***6,265.00***	
THE SUM OF \$6,265dols 00cts		DOLLARS	
VOID OVER \$6,265.00		Two signatures required for amount over \$50,000.00	
Remitter: DEBRA LONSTAD	Authorized Signature: 		
Cashier's Check	Authorized Signature: 		
⑆30101⑆⑆⑆⑆065009⑆50⑆10.00000⑆01⑆			

C-C 00697
CONFIDENTIAL


 Northern Trust Bank of Florida N.A.
 Office BOCA RATON FCB
 Date 07-28-2003

Pay to the order of ***BOSTON HARLEY-DAVIDSON*** \$ ***12,054.00***
 THE SUM OF 12,054 dols 00 cts
 DOLLARS

VOID OVER \$12,054.00
 Two signatures required for amount over \$50,000.00

Remitter Sonia Padroja
 Cashier's Check

Authorized Signature [Signature]
 Authorized Signature [Signature]

001053 0066089650 1010000101
 C-C 00804
 CONFIDENTIAL

EXHIBIT 21

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EXHIBITS: 1 - 11

UNITED STATES DISTRICT COURT

District of Massachusetts

CYCLE-CRAFT CO., INC.)
d/b/a BOSTON)
HARLEY-DAVIDSON/BUELL,)
Plaintiff,)

VS.)

Case No.

04 11402 NMG

HARLEY-DAVIDSON MOTOR)
COMPANY, INC., and BUELL)
DISTRIBUTION COMPANY, LLC.)
Defendants.)

VIDEOTAPED DEPOSITION OF JEFFREY P.
CHRISTENSEN, a witness called by and on behalf
of the Defendants, taken pursuant to the
applicable provisions of the Federal Rules of
Civil Procedure, before Sandra L. Bray,
Registered Diplomate Reporter, CSR Number
103593, and Notary Public in and for
Commonwealth of Massachusetts, at the offices of
Boynton Waldron Dolcaci Woodman & Scott, P.A.,
82 Court Street, Portsmouth, New Hampshire, on
Wednesday, April 6, 2005, commencing at
9:58 a.m.

REPORTERS, INC.

GENERAL & TECHNICAL COURT REPORTING
23 Merrymont Road, Quincy, MA 02169
617.786.7783/facsimile 617.786.7723

1 A. Seven, eight, yes. Yes, I'm surprised one's in
2 my name, though.

3 Q. And why are you surprised that one's in your
4 name, Mr. Christensen?

5 A. Well, usually I can't buy any new bikes in my
6 name.

7 Q. And if you look back on Page 1, Mr. Christensen,
8 on the bottom, there's a signature down on the
9 left. Do you recognize that signature?

10 A. Looks like Jason's.

11 Q. How about there's initials on the right,
12 dealer's signature? Do you recall who that is?

13 A. No.

14 MR. BENSON: Would you mark this as
15 Exhibit 3, please?

16 (Motorcycle Bills of Sale were marked
17 Exhibit Number 3 for identification.)

18 Q. Mr. Christensen, can you take a look at what's
19 been marked as Exhibit 3? Take a look at that,
20 and let me know whether you recognize these
21 documents.

22 A. Yes, these look like the bill of sales for all
23 the bikes. Yep. I think everybody went down
24 and signed individually for them.

1 Q. Didn't sell one of these motorcycles to Michael
2 Gallagher?

3 A. No.

4 Q. Didn't sell one to Denise Gallagher?

5 A. No.

6 Q. You yourself personally didn't buy one of these
7 motorcycles?

8 A. Well, I bought one here, yeah.

9 Q. And that was purchasing on behalf of Lee Custom
10 Cycle?

11 MS. SMAGULA: Objection.

12 A. Yeah.

13 Q. Is that true?

14 A. Correct.

15 MR. BENSON: Would you mark this as
16 Exhibit 4, please?

17 (Certificates of Origin For a Vehicle
18 were marked Exhibit Number 4 for
19 identification.)

20 Q. Would you take a look at what's been marked as
21 Exhibit 4, Mr. Christensen, and let me know
22 whether you recognize these documents?

23 A. Yes, these would be a copy of the title on
24 those.

1 Q. On the eight motorcycles?

2 A. Correct.

3 Q. Okay. And these are the eight motorcycles that
4 were purchased by Lee Custom Cycle?

5 MS. SMAGULA: Objection.

6 A. Correct.

7 Q. What's that, sir?

8 A. Correct.

9 Q. And is that your signature on the second page of
10 this document?

11 A. Is that my signature? Yep.

12 Q. And do you recall how Lee Custom Cycle received
13 copies of these documents?

14 A. I honestly don't.

15 Q. Do you recall receiving these at any time from
16 Boston Harley-Davidson?

17 A. Dave would have. I don't know if the people
18 individually brought them in, back to David
19 or...

20 Q. Mr. Karp would know that?

21 A. Yeah. Probably everybody individually brought
22 them in and gave them to Dave.

23 Q. Okay. Do you have any knowledge of that?

24 A. I'm not 100 percent sure.

1 Q. Let me know whether you've seen these drivers'
2 licenses before.

3 A. Yeah.

4 Q. When do you recall seeing these?

5 A. I don't know. I know these guys, so I've seen
6 their license before.

7 Q. Do you recall providing these licenses to Boston
8 Harley-Davidson, copies of these licenses?

9 MS. SMAGULA: Objection.

10 A. These people must have gone in and then given
11 them to him when they signed the titles and
12 everything like that.

13 Q. Do you have any knowledge of that?

14 A. That's what we always do. That's what they must
15 do. When you go to buy the thing, to get the
16 title, they want a copy of your license.

17 Q. But these individuals did not purchase the
18 motorcycles themselves, is that fair to say?

19 A. Yeah, but the whole --

20 MS. SMAGULA: Objection. Sorry.

21 A. The whole thing, did Jason know that these were
22 going to Lee Custom Cycle? Yeah. Did Boston
23 Harley know they were going to Lee Custom Cycle?
24 Probably not. Did Jaime know they were going to

1 You may inquire.

2 MS. SMAGULA: Okay.

3 Q. Mr. Christensen, going back to your
4 conversations with Jason, Jason Morasca, what
5 did Jason say to you about individuals
6 purchasing the bikes?

7 A. Probably just got to have some names to put the
8 people -- you know, the titles in.

9 Q. I want you to be -- I know this is a long time
10 ago. I just want you to be as precise as you
11 can. What do you remember him saying to you?

12 A. "Got to get some names to put these bikes in."

13 Q. Do you recall -- was he saying that in response
14 to something you had said?

15 A. No, not really.

16 Q. What was your --

17 A. Like I said, we all kind of know the deal. I
18 mean I've done that at Seacoast for years. They
19 knew that the bikes were going somewhere else.
20 I bring my dad in. He was 70 years old. We put
21 one in his name. They know my dad's not driving
22 the bike. So I mean I've just been doing that
23 forever.

24 Q. But did Jason Morasca know any of these

1 from --

2 A. No.

3 Q. -- that?

4 A. No.

5 Q. So Lee Custom Cycle has never had any trouble
6 with the police with regards to selling bikes?

7 A. We donate our lease on a PD bike. We've done
8 that before. We have a real good rapport with
9 the town, with the police and everybody. We
10 give firefighter and police discounts.

11 Q. Has Lee Custom Cycle ever been investigated
12 about taping over VIN numbers?

13 A. Yes, something came up about that.

14 Q. What was that?

15 A. I went down there to register a bike, a custom
16 bike that I bought at a bike show up in Maine,
17 and the guy never registered it. He never did
18 the title work on it. He built it. The guy's
19 like a little Jesse James or something. It was
20 funny. We were at the show, and he said, "I
21 bought my first bike from you, man," and he's
22 building all these exotic choppers.

23 So I went down to DMV to register it.
24 I had all the paperwork and stuff, and the guy

1 down at DMV and I grew up together. He says,
2 "Jeez, it's funny, Jeff. Your name has come
3 across my desk a lot lately." I said, "Really.
4 What's that about?" "Well, Seacoast Harley
5 called up the New Hampshire Dealers Association
6 or DMV, motor vehicles, and wanted to know why
7 am I taping up my VIN numbers and what are they,
8 stolen motorcycles, and yadda, yadda, yadda.

9 So they had a few meetings on it to
10 see if it was legal or not, and they did come up
11 with the answer that, "Yes, they can be taped up
12 while they're in my possession, but when they
13 leave, after they're sold, they have to be
14 untaped and they can't be altered or covered up
15 in any way." So I assured him that he made the
16 right decision because they're doing that in
17 every other state in the United States.

18 Q. So do you have bikes on the floor of Lee Custom
19 Cycle with VIN numbers taped over?

20 A. Once in a while we do.

21 Q. What is the purpose of that?

22 A. Just so Ed can't get in there through a spy or
23 somebody else, get the VIN numbers, then call up
24 and cry to Harley-Davidson, have them run the

1 VIN numbers and find out the dealers I bought
2 the bikes from. Then the dealer gets in trouble
3 that I bought the bike from, but the dealers
4 don't know -- somebody comes in with, you know,
5 a license and everything like that, they don't
6 know.

7 Q. It's your understanding that the dealer is not
8 aware?

9 MR. BENSON: Objection. Move to
10 strike.

11 A. Yes. Lee Custom Cycle is buying the bike. Lee
12 Custom Cycle isn't on the bank check. You know
13 what I mean? So the dealer can be sitting there
14 and not even know that we suck bikes out. We
15 suck bikes out of Seacoast Harley-Davidson; they
16 don't even know it. We're very aggressive.
17 It's America. These things are all titled.

18 You know if we did this with sit-down
19 lawn mowers out of Wal-Mart, where would we be?
20 We'd be entrepreneurs; we'd be true Americans
21 and stuff. You try to do it with a couple of
22 Harleys, and everybody is all worried that you
23 might be able to make a couple bucks off it, you
24 know?

1 I mean, is buying a Harley illegal
2 now? I mean, can somebody go in and buy one? I
3 mean, what's the big deal?

4 MS. SMAGULA: I just need a minute.

5 Q. Mr. Christensen, so whenever Lee Custom Cycle
6 purchases bikes from Harley-Davidson dealers,
7 they provide individual names? You provide
8 individual names?

9 A. Right.

10 Q. That's your practice?

11 A. Yeah. Like I say, my dad, my family members.
12 It's just the way the deal works. They've got
13 to have somebody's name to put it in. Tons of
14 people have been doing that for a long time.
15 They have their girlfriend.

16 Q. And in your experience, is the dealer usually
17 aware?

18 MR. BENSON: Objection.

19 A. Sometimes yes, sometimes no. All depends.

20 Q. Do you personally own any Harley-Davidson bikes?

21 A. Yes, I own about 40 of them.

22 Q. You own about 40 of them?

23 (The witness nodded.)

24 Q. You ride all 40 of those?